

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	Criminal No. 23-mj-4472-DHH
)	
HUI ZHANG)	
)	
Defendant)	

GOVERNMENT'S MOTION TO SEAL COMPLAINT

The United States Attorney hereby respectfully moves the Court to seal the complaint, supporting affidavit, this motion and the Court's order on this motion, and any other paperwork related to this matter, until further order of this Court. As grounds for this motion, the government states that public disclosure of these materials might jeopardize the ongoing investigation of this case, as well as the government's ability to arrest the defendant.

The United States Attorney further moves pursuant to General Order 06-05 that the United States Attorney be provided copies of all sealed documents that the United States Attorney has filed in the above-styled matter.

Respectfully submitted,

JOSHUA S. LEVY
Acting United States Attorney

ALLOWED David H. Hennessy U.S.M.J.
Sep 6, 2023

By: /s/ William F. Abely
WILLIAM F. ABELY
Assistant U.S. Attorney

Date: 09/05/2023